

**IN THE COURT OF HON'BLE ADDL. SESSIONS JUDGE  
AT KAIJ**

**CRI. BAIL APPLN. NO. 66 /2026**

**Applicant:-** Dilip Sahadeo Kendre,  
age 30 years Years; Occup plumbing  
work R/o Chincholi Mafi, Tq.Kaij,  
Dist. Beed.

**Versus.**

**Respondent:-** The State of Maharashtra

**Crime No.:-** 59/2026

**Police Station:-** Kaij

**Charge:-** U/Sec.324(5),324(4), 326(g) of BNS,  
2023

**Petition U/Sec. 82 of the Bharatiya Nagarik Suraksha Sanhita, 2023**

**FIRST BAIL PETITION**

**In brief prosecution story is as under.**

1] That one Uddhav Angad Lamb Age-27 years, Profession Plumbing Shop, R/o. Sarukwadi Tq.Kaij Dist. Beed verbally stated before Kaij police he was at his shop till 04.00 pm on 04/02/2026. After that, he made his servant Akash Kothule sit at the shop and went to Bhogalwadi Tal. Dharur as he had a wedding of his own. Akash Kothule closed the shop at 09.00 hrs and left after giving the keys to Rishikesh Shep. He stayed there in Bhogalwadi Tal. Dharur as he had his own wedding

and a haldi program. On 05/02/2026 at around 03.00 hrs he received a call from Inamdar Saheb at Kaij Police Station and he informed him that smoke and fire were seen coming out of my Parvati Traders shop. I along with Sudam Muralidhar Munde, Aniket Ankush Neharkar, Rameshwar Sadipan Shep came to his shop and when he saw that the fire in his shop had been extinguished by the fire brigade personnel and the police. After that he had registered a report of accidental fire 02/2026 at Police Station Kaij on 05/02/2026. Based on that, the police inspected his shop and conducted a panchnama in his presence. At that time, the construction materials, pipe fittings, PVC pipes, pipe fragments, plywood doors, fiber water tanks, etc. in his shop were burnt, causing a total loss of 25 to 30 lakhs. After that, he was in the hustle of a wedding because he was getting married.

2] On 07/02/2026 he went to his burnt shop in the morning to clean it and while he was cleaning the burnt goods, he saw two holes made by a round drill machine on the top of the shop. So he went to the roof of the shop and saw two holes made by a drill machine and on that side he saw empty bottles of Bisleri and the little bit of petrol left in them looked like petrol and when he smelled it, it smelled like petrol. From that, some unknown person entered his shop between 04/02/2026 at 09.00 pm and 05/02/2026 at 03.00 am by drilling a hole with a drill machine, pouring petrol and burning the goods in the

shop, causing a total loss of 25 to 30 lakhs (twenty five to thirty lakhs). He had a complaint against the unknown person.

III] On the basis of report, police have registered the offence. The police had visited the village of applicant and made inquiry about his whereabouts and directed his family members to keep him present at police station Kaij. Therefore applicant apprehend his arrest at the hands of police hence filing this application for grant of anticipatory bail on following amongst many other grounds.

#### GROUND OF BAIL

1) That the applicant is innocent and he had not committed any offence as alleged or otherwise.

2) That the name of the applicant is not figured in the FIR. Offence is registered against unknown accused.

3) The Kaij Police falsely intending to implicate the applicant in the present crime solely on the basis of suspicion.

4) That there is no direct allegation or specific role attributed to the applicant in the complaint. There is no eye-witness, CCTV footage, recovery, or any direct or circumstantial evidence connecting the applicant with the alleged offence. The prosecution case is based purely on conjectures and surmises.

5) That the applicant is a plumber by profession and earlier

used to purchase plumbing material from the informant's shop (Parvati Traders). For the last six months, the applicant has not purchased materials from the informant's shop. Due to this business discontinuation, the informant might have developed suspicion or grievance against the applicant, leading to his false implication.

- 6) That the applicant is a law-abiding citizen with no past criminal record. He has deep roots in society and is permanently residing at the address mentioned above. If he is arrested then his reputation in the society will be lowered down.
- 7) That the applicant is ready and willing to cooperate with the investigation and abide by any conditions imposed by this Hon'ble Court. He undertakes to remain present before the Investigating Officer as and when required.
- 8) That the alleged offence pertains to an incident of arson committed by unknown persons during nighttime. The investigation mainly revolves around technical and forensic evidence. Custodial interrogation of the applicant is not required for the purpose of investigation.
- 9) That the police have visited the applicant's village and directed his family members to keep him present at the Police Station, which gives rise to a reasonable apprehension of arrest.

10) That the applicant is permanently residing at Chincholi Mali, Tq. Kaij, Dist. Beed, and there is no possibility of him absconding or tampering with prosecution evidence.

11) The alleged incident has already been investigated through spot panchnama and fire brigade report. The material evidence is already in police custody; hence there is no chance of tampering.

12) That it is a settled principle of law that arrest should not be mechanical and anticipatory bail should be granted where the accused is cooperating & custodial interrogation is not required.

13) That there is delay in lodging the report. It creates serious doubt about the prosecution story.

14) That with intent to obtain financial aid / compensation from Insurance Company, this informant might have lodged this report.

15) That it reveals from the contents of FIR provisions of 324(5), 324(4) and 326 (g) of B.N.S.2023 are not made out against the applicant. Hence, he is entitled for anticipatory bail.

16) That no purpose would be served by detaining the applicant behind the bar.

17) That, the applicant is ready to abide by any condition while released on anticipatory bail and ready to appear


before the I.O. for further investigation of crime.

- 18) That applicant has not committed mischief by causing damage to informant's property by fire or explosive substance.
- 19) That the applicant craves, leave to amend, alter or add grounds of bail.

**IT IS THEREFORE PRAYED THAT**

That, application may kindly be allowed and the applicant may be released on bail in the event of his arrest in Crime No. 59/2026 registered at Police Station Kaij, under Sections 324(5), 324(4), 326(g) of BNS, 2023.

Kaij.  
Date: 04.03.2026

  
(Pradeep Etape)  
Advocate for applicant

Order  
Issue Notice to State